

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TONY KOLE, individually and as President
and Manager of Ghost Industries, LLC, and
GHOST INDUSTRIES, LLC, an Illinois
limited liability company,

Plaintiffs,

v.

No. 11-CV-03871

VILLAGE OF NORRIDGE, an Illinois
municipal corporation, RONALD A.
OPPEDISANO, individually and as President
of the Village of Norridge, JAMES J. JOBE,
Chief of Police of the Village of Norridge,
JUDITH D. BERNARDI, Clerk of Village of
Norridge, URSULA A. KUCHARSKI,
DENNIS H. STEFANOWICZ, DOMINIC
SULIMOWSKI, JACQUELINE GREGORIO,
AND ROBERT MARTWICK, individually
and as Trustees of the Village of the Norridge
and MARK V. CHESTER, individually and as
Village Attorney of the Village of Norridge,

Defendants.

DEFENDANTS' SECOND MOTION FOR EXTENSION TO FILE REPLY

NOW COME the Defendants, VILLAGE OF NORRIDGE, RONALD A.
OPPEDISANO, JAMES J. JOBE, JUDITH D. BERNARDI, URSULA A. KUCHARSKI,
DENNIS H. STEFANOWICZ, DOMINIC SULIMOWSKI, DOMINIC S. FALAGARIO,
JACQUELINE GREGORIO, ROBERT MARTWICK and MARK V. CHESTER, by and
through their counsel, ANCEL, GLINK, DIAMOND, BUSH, DiCIANNI & KRAFTHEFER,
P.C., and move this Court for an extension of time to file their Reply to Plaintiffs' Response to
Defendants' Motion to Dismiss, and in support of that motion, state the following

1. Pending before the court is defendants' Motion to Dismiss plaintiffs' Amended Complaint, which contains 15 separate counts, alleging violations of nine constitutional provisions, three federal statutes, and making six separate state law claims, and which seeks injunctive relief and money damages against nine defendants.

2. Defendants' Motion to Dismiss and supporting Memorandum of Law were filed with the court on September 29, 2011. The court allowed defendants to file an oversized memorandum of law of 43 pages.

3. After four extensions, plaintiffs filed their response on January 10, 2012, and defendants were granted 21 days, until January 31, 2012, to reply. Plaintiffs' response is 48 pages long.

4. Given the size and structure of plaintiffs' response, defendants requested and were granted one additional week to Reply. In the interim, counsel for defendants became preoccupied with a number of unexpected emergency matters that diverted his attention from the Reply. Defendants request one final 10-day extension to file their Reply.

5. Plaintiffs have no objection to this motion.

WHEREFORE, Defendants pray this Court extend the time to file their Reply an additional 10 days, until February 17, 2012.

/s/ Thomas G. DiCianni

Thomas G. DiCianni (ARDC #03127041)

tdicianni@ancelglink.com

ANCEL, GLINK, DIAMOND, BUSH, DICIANNI & KRAFTHFER, P.C.

Attorney for Defendants

140 South Dearborn Street, 6th Floor

Chicago, Illinois 60603

(312) 782-7606

(312) 782-0943 Fax

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Defendants.

CERTIFICATE OF SERVICE

The undersigned, one of the attorneys of record herein, hereby certifies that on February 8, 2012, the foregoing **DEFENDANTS' SECOND MOTION FOR EXTENSION TO FILE REPLY** was electronically filed with the Clerk of the U.S. District Court using the CM/ECF System, which will send notification of such filing to the following:

Walter Peter Maksym , Jr.
2056 North Lincoln Avenue
Chicago, IL 60614-4525
Email: wmaksym@gmail.com

/s/ Thomas G. DiCianni

THOMAS G. DiCIANNI, (ARDC# 03127041)

One of the attorneys for Defendants

ANCEL, GLINK, DIAMOND, BUSH, DICIANNI
& KRAFTHEFER, P.C.

140 South Dearborn Street, Sixth Floor

Chicago, Illinois 60603

Telephone: (312) 782-7606

Facsimile: (312) 782-0943

E-Mail: tdicianni@ancelglink.com